

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

CHAN KWOK SHING, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

ICON PLC, STEPHEN CUTLER, and
BRENDAN BRENNAN,

Defendants.

Case No. 2:25-cv-763-JS-ARL

CLASS ACTION

POLICE AND FIRE RETIREMENT
SYSTEM OF THE CITY OF DETROIT
Individually and on Behalf of All Others
Similarly Situated,

Plaintiff,

v.

ICON PLC, STEPHEN CUTLER, and
BRENDAN BRENNAN,

Defendants.

Case No. 2:25-cv-1807-HG

CLASS ACTION

**DECLARATION OF MICHAEL A. TOOMEY IN SUPPORT
OF THE PUBLIC EMPLOYEES' RETIREMENT
SYSTEM OF MISSISSIPPI'S MOTION FOR CONSOLIDATION, APPOINTMENT AS
LEAD PLAINTIFF AND APPROVAL OF ITS SELECTION OF LEAD COUNSEL**

I, Michael A. Toomey, declare as follows:

1. I am a member in good standing of the bars of the State of New York and of this Court. I am a partner in the law firm of Barrack, Rodos & Bacine. I submit this declaration in support of the motion filed by the Public Employees' Retirement System of Mississippi ("MPERS") for: (1) consolidation of the above-captioned cases; (2) appointment as lead

plaintiff; (4) approval of its selection of Barrack, Rodos & Bacine to serve as lead counsel for the Class; and (5) any such further relief as the Court may deem just and proper.

2. Attached as Exhibits A through D are true and correct copies of the following documents:

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| EXHIBIT 1: | Certification of Tricia L. Beale, Deputy Director and Special Assistant Attorney General in the Office of the Attorney General of the State of Mississippi |
| EXHIBIT 2: | FIFO and LIFO Loss Charts of MPERS |
| EXHIBIT 3: | Notice of Pendency of <i>Shing v. ICON plc, et al.</i> , No. 25-cv-763 (E.D.N.Y. filed February 10, 2025) |
| EXHIBIT 4: | Firm Biography of Barrack, Rodos & Bacine |

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed this 11th day of April 2025.

/s/ Michael Toomey
Michael A. Toomey